

**Federal Defenders
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August 21, 2024

BY ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Manley Allen,
23 Cr. 681 (JGK)**

Dear Judge Koeltl:

I write with the consent of the government request an adjournment of the deadline for filing defense Rule 12 motions by not less than 30 days. The motions deadline is currently tomorrow, August 22, 2024. An extension of this deadline—and a proportionate extension of related deadlines in the event motions are filed—is necessary both to give me time to file effective motions on behalf of Mr. Allen and also because the parties are engaged in plea discussions that we hope will lead to a resolution of the case without motions practice. Earlier this week, I made a submission of mitigation material to the government. Separately, I understand from the government that negotiations may be more fruitful for Mr. Allen before motions are filed than after. We are now planning to schedule an in-person meeting to discuss a disposition. Adjourning the motions deadlines by 30 days will allow the government to review the mitigation material that I provided and for the parties to endeavor to resolve this case in the interest of justice.

This is my first motion for an adjournment or extension in this matter. As noted, the government consents to this request.

Respectfully submitted,

/s/


Clay H. Kaminsky
Kristoff Williams
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8/27/24

- The motion is granted.
Defendants' moving papers are now due 9/23/24, the Government's answering papers on 10/14/24, the defendant's reply papers on 10/28/24, and a hearing on the motions will take place on 11/7/24 at 2:30 p.m.

CC: AUSA Thomas John Wright

SC ORDERED


JSS
Part I